

**REMARKS/ARGUMENTS**

Claims 1, 2, 4-13, 15, and 16 are currently pending. Applicants have amended claims 1, 2, 7 and 13. Applicants submit that no new matter has been added as result of these amendments.

Claims 1, 2, and 4-6 stand rejected under 35 U.S.C. §101 as being nonstatutory subject matter.

Claims 1, 2, 4-13, 15, and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over IP Infusion ("Virtual Routing for Provider Edge Applications", a white paper by IP Infusion, Inc.) in view of Huang ("The ENTRAPID Protocol Development Environment").

Reconsideration in view of the foregoing amendments and the following remarks is respectfully requested.

**Rejections under 35 U.S.C. §101**

Claims 1, 2, and 4-6 stand rejected under 35 U.S.C. §101 as being nonstatutory subject matter.

Solely in order to expedite prosecution, claim 1 has been amended to recite "a plurality of virtual routers, wherein the plurality of virtual routers comprise a plurality of instructions for controlling a data processor to perform one or more tasks, the instructions being stored on a computer readable medium." It is to be understood that the amendments to claim 1 have been made to pursue a speedy allowance and not as a concession on the merits of the rejections. Applicants submit that the claim 1 is not directed to software *per se* and is directed to statutory subject matter. Claims 2 and 4-6, which depend from claim 1, should also be statutory subject matter.

Accordingly, withdrawal of the rejection of claims 1, 2, and 4-6 is respectfully requested.

**Rejections under 35 U.S.C. 103**

Claims 1, 2, 4-13, 15, and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over IP Infusion in view of Huang.

Solely in order to expedite prosecution and not as a concession to the merits of the rejections, independent claims 1, 7, and 13 have been amended, and Applicants submit that even if IP Infusion and Huang could be combined as suggested in the Office Action, the combination fails to disclose or suggest all of the features of independent claims 1, 7, and 13. For example, claim 1 recites, in part:

a plurality of virtual routers ..., wherein virtual router further comprises:  
a routing protocol stack configured to handle a plurality of routing protocols;  
a plurality of interface drivers configured to communicate with a plurality of corresponding physical interfaces;  
an Internet Protocol (IP) stack configured to interact with the routing protocol stack and perform a forwarding function via the plurality of interface drivers, the IP stack having a forwarding information table, information from which is used to perform the forwarding function, *wherein the routing protocol stack and the IP protocol stack are implemented using dynamic libraries shared among the plurality of virtual routers*.

Applicants submit that the combination of IP Infusion and Huang fails to teach these features of claim 1.

Neither IP Infusion nor Huang refer to virtual routers including a routing protocol stack and an IP stack that are implemented using shared libraries as recited in claim 1. Implementing separate IP stacks and protocol stacks for each virtual router may require a substantial amount of memory. The virtual routers recited in claim 1 include an IP stack and a protocol stack that are implemented using shared libraries. By using shared libraries, the amount of memory required to implement multiple virtual routers may be substantially reduced. See specification at ¶ [0018].

Claims 7 and 13 should be allowable for similar reasons as claim 1. Furthermore, dependent claims 2 and 4-6, which depend from claim 1, claims 8-12, which depend from claim 7, and claims 15 and 16, which depend from claim 13, should also be condition for allowance at least due to their dependence from independent claims 1, 7, and 13, respectively.

Accordingly, withdrawal of the rejection of claims 1, 2, 4-13, 15, and 16 under 35 U.S.C. §103(a) is respectfully requested.

Appl. No. 10/775,732  
Amtd. dated August 13, 2008  
Amendment under 37 CFR 1.116 Expedited Procedure  
Examining Group 2144

PATENT

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 858-350-6100.

Respectfully submitted,



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